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*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOSHUA HU, individually and on behalf of all  
others similarly situated,

Case No. 2:18-cv-04363(KM/JBC)

Plaintiffs,

v.

BMW OF NORTH AMERICA LLC, a Delaware  
corporation; and BAYERISCHE MOTOREN  
WERKE AKTIENGESELLSCHAFT (BMW AG),  
a corporation organized under the laws of  
Germany,

Defendants.

KAITLYN DENNIS, ESQ., of full age, hereby declares as follows:

1. I am an associate of the law firm of Gustafson Gluek PLLC, 120 South Sixth Street,  
Suite 2600, Minneapolis, Minnesota 55402. I respectfully submit this Declaration in support of  
my application to appear as counsel *pro hac vice* for Plaintiffs in the above-captioned matter. I  
am personally familiar with the facts set forth herein based upon my personal knowledge.

2. I am admitted to practice, and I am in good standing, before the Courts as set forth  
on the attached list of court admissions.

3. There are no disciplinary proceedings pending and no discipline previously imposed against me as a member of the Bar in any jurisdiction. I understand my continuing obligation to advise the Court of any disciplinary proceeding that may be instituted against me.

4. Pursuant to Local Civil Rule 101.1(c), the law firms of Hagens Berman Sobol Shapiro LLP and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C., attorneys of record for Plaintiffs in this litigation, will continue to serve as counsel of record in this matter; will review and sign all pleadings, briefs, and other papers filed with the Court on behalf of Plaintiffs; and will be present for all appearances before the Court unless previously excused from appearing by Court.

5. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial, or other proceedings; to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the Court may deem proper; and to otherwise abide by all the terms and conditions of Local Civil Rule 101.1(c). I agree to be bound by the rules governing practice in the New Jersey Courts, including the disciplinary rules.

6. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay the annual fee required by the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and as directed by the Trustees of the Fund. I further agree that, pursuant to Local Civil Rule 101.1(c)(3), I shall pay \$150.00 to the Clerk of the United States District Court for the District of New Jersey.

7. For the foregoing reasons, I respectfully request on behalf of Plaintiffs that I be admitted *pro hac vice* for the purpose of representing Plaintiffs in this litigation in association with Hagens Berman Sobol Shapiro LLP and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: March 21, 2023

/s/ Kaitlyn Dennis

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KAITYLN DENNIS

**Declaration of Kaitlyn Dennis- Courts of Admission**  
***Joshua Hu, et al. v. BMW of North America LLC, et al.***  
***Case No: 2:18-cv-04363-EP-JBC***

I am a member in good standing and eligible to practice before the following courts:

<b>BAR/COURT</b>	<b>DATE OF ADMISSION</b>
<b>State of Minnesota</b> Minnesota Supreme Court Lawyer Registration Office 180 East 5th Street Suite 950 St. Paul, MN 55101	2015
<b>United States District Court for the District of Minnesota</b> Diana E. Murphy United States Courthouse 300 South Fourth Street Suite 202 Minneapolis, MN 55415	2016